

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK

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In re:

The Diocese of Rochester,

Chapter 11

Case No. 19-20905 (PRW)

Debtor.

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**NOTICE OF FILING**

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**PLEASE TAKE NOTICE** that, in accordance with the *Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees* [Docket No. 318] and the *Supplement and Modification to Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees* [Docket No. 545], Burns Bair LLP has filed the *Monthly Fee Statement of Burns Bair LLP for Compensation for Services Rendered and Reimbursement of Expenses as Special Insurance Counsel to the Official Committee of Unsecured Creditors of the Diocese of Rochester for the Period November 1, 2023 through November 30, 2023*, a copy of which is attached hereto and hereby served upon you. In addition, Burns Bair LLP has provided the United States Trustee with a copy of its invoice in text format.

Dated: December 15, 2023

**BURNS BAIR LLP**

/s/ Timothy W. Burns

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Timothy W. Burns (admitted *pro hac vice*)  
Jesse J. Bair (admitted *pro hac vice*)  
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*Special Insurance Counsel to the Official Committee of Unsecured Creditors of the Diocese of Rochester*

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK

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In re:

The Diocese of Rochester,

Case No. 19-20905

Chapter 11

Debtor.

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**MONTHLY FEE STATEMENT OF BURNS BAIR LLP FOR COMPENSATION FOR  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS SPECIAL  
INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF THE DIOCESE OF ROCHESTER FOR THE PERIOD  
NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023**

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Name of Applicant:	<u>Burns Bair LLP</u>
Authorized to Provide Professional Services to:	<u>Official Committee of Unsecured Creditors of the Diocese of Rochester</u>
Date of Retention:	<u>Effective May 26, 2021 pursuant to Order entered June 22, 2021 [Docket No. 1113]</u>
Period for which compensation and reimbursement is sought:	<u>November 1, 2023 through November 30, 2023</u>
Amount of compensation sought as actual, reasonable, and necessary:	<u>80% of \$10,381.50 (\$8,305.20)</u>
Amount of expense reimbursement sought as actual, reasonable, and necessary:	<u>\$48.92</u>

This is a: X monthly    quarterly    final application.

This is Burns Bair LLP's thirtieth monthly fee statement in this case.

# **EXHIBIT A**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
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**Official Committee of Unsecured Creditors of  
The Diocese of Rochester, New York**

**Issue Date :** 12/15/2023

**Bill # :** 01327

**Due Date :** Upon Receipt

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

<b>Date</b>	<b>Timekeeper</b>	<b>Narrative</b>	<b>Hours</b>	<b>Amount</b>
11/2/2023	Jesse Bair	Participate in portion of PSZJ weekly meeting re case strategy, ongoing projects, and next-steps (.2);	0.20	\$125.00
11/2/2023	Jesse Bair	Review I. Scharf correspondence re disclosure statement notice issues (.1);	0.10	\$62.50
11/7/2023	Timothy Burns	Participate in call with state court counsel re plan issues (.2); met with J. Bair re same (.2);	0.40	\$280.00
11/7/2023	Jesse Bair	Conference with T. Burns re Plan litigation status and strategy (.2);	0.20	\$125.00
11/8/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re Plan litigation status and next-steps (.7);	0.70	\$437.50
11/9/2023	Timothy Burns	Participate in conference with PSZJ and J. Bair re Plan litigation and related projects (.7); review correspondence with PSZJ and Interstate re meet and confer re settlement agreement and Plan (.1); review correspondence with CNA re meet and confer re Plan issues (.1);	0.90	\$630.00
11/9/2023	Jesse Bair	Participate in meeting with PSZJ and T. Burns re Plan litigation strategy, status, and ongoing projects (.7); correspond with PSZJ and T. Burns re research re impact of CNA's breach on its ability to control the Debtor's defense (.1);	0.80	\$500.00
11/10/2023	Timothy Burns	Review draft CNA Objection insert in connection with upcoming admin claim and disclosure statement objection filings (.2);	0.20	\$140.00
11/13/2023	Jesse Bair	Conference with T. Burns re Plan litigation issues (.1);	0.10	\$62.50
11/13/2023	Timothy Burns	Conference with J. Bair re plan litigation issues (.1)	0.10	\$70.00
11/13/2023	Jesse Bair	Review agenda for upcoming state court counsel meeting (.1);	0.10	\$62.50
11/13/2023	Jesse Bair	Review correspondence with the Debtor and CNA re meet and confer to discuss Plan solicitation issues (.1);	0.10	\$62.50
11/14/2023	Jesse Bair	Review additional correspondence with the Debtor and CNA re call to discuss Plan solicitation issues (.1);	0.10	\$62.50

11/15/2023 Jesse Bair	Review additional correspondence with CNA and the Debtor re upcoming Plan-related meet and confer (.1);	0.10	\$62.50
11/15/2023 Timothy Burns	Review and analyze Continental's Response to the Committee's 9019 mootness Motion (.8); review state court counsel correspondence re Plan issues (.2);	1.00	\$700.00
11/16/2023 Jesse Bair	Correspondence with PSZJ re weekly strategy and team planning call (.1);	0.10	\$62.50
11/18/2023 Jesse Bair	Review correspondence with PSZJ re Plan litigation issues (.1);	0.10	\$62.50
11/20/2023 Timothy Burns	Participate in BB team meeting re case developments and ongoing insurance projects (.2);	0.20	\$140.00
11/20/2023 Timothy Burns	Conference with J. Bair re Plan litigation projects (.1);	0.10	\$70.00
11/20/2023 Jesse Bair	Conference with T. Burns re Plan litigation projects (.1)	0.10	\$62.50
11/20/2023 Jesse Bair	Participate in BB team meeting re case developments and ongoing insurance projects (.2);	0.20	\$125.00
11/20/2023 Jesse Bair	Correspondence with PSZJ re Plan litigation strategy meeting (.1);	0.10	\$62.50
11/20/2023 Jesse Bair	Review Debtor correspondence re logistics for December case hearings (.1);	0.10	\$62.50
11/20/2023 Nathan Kuenzi	Participate in BB team meeting re case developments and ongoing insurance projects (.2);	0.20	\$84.00
11/21/2023 Jesse Bair	Participate in meeting with PSZJ re Plan litigation, strategy, and ongoing tasks re same (.6);	0.60	\$375.00
11/21/2023 Jesse Bair	Participate in meet and confer with CNA and the Debtor re Plan solicitation and ballot issues (.5);	0.50	\$312.50
11/21/2023 Jesse Bair	Correspondence with PSZJ re meet and confer with Interstate re settlement agreement edits (.1);	0.10	\$62.50
11/21/2023 Jesse Bair	Correspondence with T. Burns and N. Kuenzi re Plan discovery against CNA (.1);	0.10	\$62.50
11/21/2023 Nathan Kuenzi	Analyze CNA's Plan in connection with drafting the Committee's Plan-related discovery requests to CNA (.6);	0.60	\$252.00
11/22/2023 Jesse Bair	Review and assess upcoming case insurance deadlines and projects (.1);	0.10	\$62.50
11/28/2023 Jesse Bair	Brief review re the Committee's proposed edits to the LMI settlement agreement (.1); correspondence with PSZJ re meeting with LMI to discuss same (.1);	0.20	\$125.00
11/28/2023 Jesse Bair	Analysis regarding potential Plan discovery on CNA (.1);	0.10	\$62.50
11/28/2023 Nathan Kuenzi	Analysis re CNA's purported administrative claim in connection with drafting the Committee's Plan-related discovery requests to CNA (1.3);	1.30	\$546.00
11/29/2023 Jesse Bair	Continue analyzing potential Plan discovery on CNA (.3); correspond with N. Kuenzi re preparing initial draft of same (.2);	0.50	\$312.50
11/29/2023 Nathan Kuenzi	Begin drafting the Committee's Plan-related discovery requests to CNA (2.3);	2.30	\$966.00

11/29/2023	Timothy Burns	Review correspondence with PSZJ, LMI, and J. Bair re potential changes to the LMI settlement agreement and Plan (.2); review correspondence with J. Bair and N. Kuenzi re discovery requests re Plan confirmation (.1);	0.30	\$210.00
11/30/2023	Nathan Kuenzi	Finish drafting the Committee's Plan-related discovery requests to CNA, including incorporation of suggested edits from T. Burns (5.8);	5.80	\$2,436.00
11/30/2023	Nathan Kuenzi	Analyze case hearing transcripts and other underlying case materials in connection with drafting the Committee's Plan-related discovery requests to CNA (1.0);	1.00	\$420.00
11/30/2023	Jesse Bair	Review correspondence with LMI and the debtor re meet and confer re the LMI settlement agreement (.1);	0.10	\$62.50

<b>Total Hours and Fees</b>	<b>19.90</b>	<b>\$10,381.50</b>
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#### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
11/1/2023	CloudNine database monthly hosting fee (October 2023)	\$45.62
11/20/2023	Postage	\$3.30
<b>Total Expenses</b>		<b>\$48.92</b>

#### Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jesse Bair	Partner	5.50	\$625.00	\$3,437.50
Nathan Kuenzi	Associate	11.20	\$420.00	\$4,704.00
Timothy Burns	Partner	3.20	\$700.00	\$2,240.00

**Total Due This Invoice: \$10,430.42**